

**EPSTEIN SACKS PLLC**  
**ATTORNEYS AT LAW**  
**100 LAFAYETTE STREET**  
**SUITE 502**  
**NEW YORK, N.Y. 10013**  
**(212) 684-1230**


**BENNETT M. EPSTEIN: (917) 653-7116**  
**SARAH M. SACKS: (917) 566-6196**

September 17, 2021

Hon. John P. Cronan  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

**SO ORDERED.**

**Date: September 17, 2021**  
**New York, New York**

  
JOHN P. CRONAN  
United States District Judge

Filed by ECF

*United States v. Gabriel Caballero*  
21 Cr. 253 (JPC)

Dear Judge Cronan:

We represent the defendant Gabriel Caballero under the Criminal Justice Act. An in-person change of plea proceeding in this case is scheduled for this coming Monday, September 20, 2021. We write to inform the Court that we just learned that [REDACTED]

[REDACTED] For this reason, we ask that the Court adjourn Monday's in-person proceeding for approximately three weeks. We have discussed this request with the Government, and they have no objection. On behalf of Mr. Caballero, we consent to waive time under the Speedy Trial Act until the date the Court sets for that appearance.

Respectfully submitted,

*Sarah M. Sacks*